



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

September 23, 2015

DAN BACKER, TREASURER  
CONSERVATIVE ACTION FUND  
203 SOUTH UNION STREET SUITE 300  
ALEXANDRIA, VA 22314

**Response Due Date**

**10/28/2015**

IDENTIFICATION NUMBER: C00496505

REFERENCE: 48-HOUR NOTIFICATION REPORT, RECEIVED 08/27/2015

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 1 item(s):

- Your committee filed a 48 Hour Report (see attached) informing the Commission of independent expenditures made in support of federal candidates which have been designated for "2016 GOP Convention." Please be advised that itemized independent expenditures disclosed on 24 and 48 Hour Reports should disclose the following information: the name and mailing address of the payee, the purpose of the expenditure, the date the communication is publicly disseminated or distributed, the amount, the name and office sought, state and district (if applicable) of the federal candidate, the calendar year-to-date, per election, for office sought total, the election designation, an indication of whether the candidate was supported or opposed and the signature of the treasurer. If these independent expenditures were made for a state's primary election, please amend the 48 Hour Report by providing the state. (11 CFR §104.4(b) and (c))

The Commission notes the Miscellaneous Electronic Submission, received 8/27/15, that states in part "The expenditures identified in the report are for nationally distributed communications that do not target any one state. This Committee refuses to file a report that inaccurately declares these expenditures as being for any one state, and instead reports them with respect to the Presidential Nominating Convention. This Committee is aware that the Commission would prefer committees in this situation to file false reports as if the expenditures are targeted to a specific state, as expected by the Commission

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in Advisory Opinion 2011-28. This Committee refuses to sully the public record with such absurd fabrication, and encourages the commission to issue better guidance than "please lie to us." If these independent expenditures were for a state's primary election, please be advised that each State's Presidential primary is considered a separate election for purposes of aggregating independent expenditures. Advisory Opinion 2003-40.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1176.

Sincerely,



Arman Tarzi  
Senior Campaign Finance Analyst  
Reports Analysis Division

**Missing Information - 48 Hour Report**  
**Conservative Action Fund (C00496505)**

<b>Name of Payee</b>	<b>Date</b>	<b>Amount</b>	<b>Candidate</b>
American Action News	8/6/15	\$2,000.00	Donald Trump
American Action News	8/27/15	\$10,000.00	Donald Trump
American Action News	8/25/15	\$2,000.00	Donald Trump
Campaign Solutions	8/8/15	\$2,000.00	Donald Trump
Campaign Solutions	8/21/15	\$500.00	Donald Trump
Campaign Solutions	8/26/15	\$500.00	Donald Trump
Campaign Solutions	8/27/15	\$3,000.00	Donald Trump
Political List Brokers	8/8/15	\$5,000.00	Donald Trump
Political List Brokers	8/25/15	\$5,000.00	Donald Trump